Anti-Bribery and Anti-Corruption Policy

HARMAN COMPLIANCE
CONNECTED BY INTEGRITY

Purpose

HARMAN International, Inc., and all its businesses and subsidiaries worldwide ("HARMAN" or the "Company") is committed to conducting business with integrity and in full compliance with all applicable anti-bribery and anti-corruption ("ABAC") laws. This Anti-Bribery and Anti-Corruption Policy (the "Policy") sets forth the Company's expectations and requirements for preventing bribery and corruption in all business activities.

Scope & Applicability

This mandatory Policy applies to all HARMAN employees, officers, directors, subsidiaries, and third parties acting on behalf of HARMAN, regardless of location (collectively, "HARMAN Personnel"). All HARMAN Personnel are required to comply with this Policy. Non-compliance may, consistent with applicable law, result in disciplinary action up to and including termination of employment or contractual relationship.

Policy Statement

HARMAN does not tolerate bribery or corruption under any circumstances. This Policy expressly prohibits any improper payments, kickbacks, or the provision or receipt of gifts, entertainment, or any other benefit to or from business partners or any other party for the purpose of obtaining an improper business advantage or personal benefit. HARMAN Personnel must immediately report any actual or attempts of bribery or corruption, failure to do so will result in termination.

HARMAN complies with all applicable ABAC laws, including, but not limited to, the Foreign Corrupt Practices Act and the UK Bribery Act 2010, as well as other applicable local laws. HARMAN Personnel may not circumvent this Policy or related controls through third parties or other intermediaries.

Prohibited Business Practices

HARMAN strictly prohibits the following:

Commercial Bribery

- The direct or indirect offer, payment, promise, solicitation, receipt, or authorization of bribes, kickbacks, or anything of value to improperly obtain or retain business or secure any improper advantage in dealings with private parties.

- This includes providing or receiving anything of value such as:
  - Cash or cash equivalent
  - Gifts, entertainment, or travel
  - Charitable contributions or sponsorships
  - Favors or services

- Any other benefit intended to influence a business decision

Bribery of Government Officials

- The direct or indirect offer, payment, promise, or authorization of anything of value to a government official to improperly obtain or retain business or secure any improper advantage is strictly prohibited.

- These restrictions are subject to heightened scrutiny and apply regardless of local customs or practices.

- **Government officials include:**
  - Employees of state-owned, state-controlled, or quasi-governmental entities
  - Officials of public international organizations
  - Members of political parties
  - Candidates for public office

Facilitating Payments

- Facilitating payments (i.e., payments made to expedite routine, non-discretionary government actions, such as obtaining permits or clearing goods through customs) are prohibited.

- In rare situations involving an imminent threat to life, health, or safety of HARMAN Personnel, a payment may be made under duress.

- Any such payment must be:
  - Reported promptly to the Legal & Compliance Department; and
  - Accurately documented in the Company's books and records

Books, Records, and Third-Party Due Diligence

Accurate Books and Records

- HARMAN maintains complete and accurate books, records, and accounts that reasonably reflect all transactions.

- All transactions must be:
  - Properly authorized
  - Supported by appropriate documentation
  - Recorded in reasonable detail

- Undisclosed or unrecorded funds or accounts are strictly prohibited.

Internal Controls

- HARMAN Personnel must comply with all applicable internal financial controls and procedures.

Third-Party Due Diligence and Oversight

- HARMAN applies risk-based due diligence procedures to third parties acting on its behalf.
- HARMAN Personnel must not engage third parties without appropriate review and approval.
- Third-party relationships must be monitored to ensure compliance with this Policy.

Related Policies

HARMAN Personnel must also comply with related Company policies addressing specific corruption risk areas, including but not limited to:

- Third Party Gifts, Travel, and Entertainment
- Charitable Contributions
- Sponsorships
- Political Activities
- Third-Party Due Diligence

Violations of these policies may also constitute violations of this Policy.

Raising Concerns

All HARMAN Personnel must immediately report any potential, suspected, or actual violations of this Policy to their manager, Human Resources at **HRCorporate@harman.com**, Legal & Compliance at **compliance@harman.com,** or via the HARMAN Speak Up Hotline. All reports will be treated as confidential to the extent possible and as permissible by law. Reports may be made by employees, suppliers, or external stakeholders, and retaliation against good faith reporting is strictly prohibited. The Company will accept and review anonymous reports where permitted by local law.

HARMAN Speak Up Hotline
• Online: speakup.harman.com • By Phone: +1 (800) 563-4037 (U.S.); If dialing internationally, please visit the speakup.harman.com click call now and select your country location • By email to compliance@harman.com • Available 24/7 • Reports can be made anonymously (where permitted by law)

Policy Oversight & Questions

The Legal & Compliance Department is responsible for oversight of this Policy. Implementation and effectiveness are reviewed periodically by executive management and the Board of Directors. Questions regarding this Policy should be directed to the Legal & Compliance Department at **compliance@harman.com**.

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Change History

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